

## **REMARKS**

Claims 1-18 are pending. Claims 1 and 3 are amended. Both claims are amended to clarify "link relationship." Neither amendment in any way surrenders a range of equivalents. Reconsideration and allowance of these claims is respectfully requested.

Claims 1-6, 8-10, 12-14 and 18 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,049,799 to Mangat et al. ("Mangat"). Applicants respectfully traverse this rejection since each and every element of the claims are not expressly or inherently described

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference," Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987); see also MPEP § 2131. "The identical invention must be shown in as complete detail as is contained in the ... claim." Richardson v. Suzuki Motor Co., 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Mangat, for example, fails to teach each and every element of claims 1 and 3.

For example, Mangat does not disclose:

means for creating link relationships between document objects, wherein the link relationships each identify a first document object, a second document object, and one or more link relationship attributes describing relationships between the first document object and the second document object, and the link relationships are separate from the first document object and the second document object,

as recited in independent claims 1 (and similarly in claim 3). Mangat does not disclose a link relationship defined as such. Therefore, Mangat does not anticipate claims 1 and 3.

Since Mangat does not disclose "link relationships" as such, it cannot disclose the remaining elements of claims 1 and 3 which reference link relationships. For example, Mangat does not disclose "a directory that stores the link relationships [between document objects]" or "storing the link relationship [between document objects] in one or more link directories," as recited in claims 1 and 3, respectively. No link relationships are stored in Mangat's Document Locator table. The cited directory tree of objects (see FIG. 2) does not include link relationships. For these same reasons, and the independent features they recite, Mangat does not anticipate dependent claims 2, 4-6, 8-10, 12-14 and 18.

Claims 7, 15 and 16 are rejected under 35 U.S.C. § 103(a) over Mangat in view of U.S. Patent No. 6,209,036 to Aldred et al. ("Aldred"). Aldred does not cure the defects of Mangat with respect to claim 3. Therefore, these claims are allowable for at least the same reasons

recited above and their own independent features. Allowance of claims 7, 15, and 16 is respectfully requested.

Claims 11 and 17 are rejected under 35 U.S.C. § 103(a) over Mangat in view of U.S. Patent No. 6,112,202 to Kleinburg ("Kleinburg"). Kleinburg does not cure the defects of Mangat with respect to claim 3. Therefore, claim 11 is allowable for at least the same reasons recited above and its own independent features.

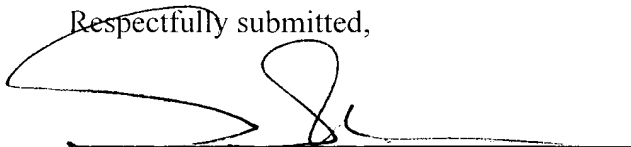
Moreover, Kleinburg does not teach "targeting users of the network to which access to the link relationship will be provided by designating characteristics of the targeted users," as recited in claim 11. The cited section of Kleinburg teaches a user entering a keyword query and the system returning pages based on that query and additional pages with content-based links to the return pages. There is no discussion of targeting users, providing access to link relationships, let alone targeting user by designating characteristics of the targeted users. Consequently, claim 11 is not rendered obvious by Mangat and Kleinburg.

Similar reasoning applies to claim 17. Kleinburg does not disclose "entering one or more targeted user characteristics...comparing the entered targeted user characteristics to available user characteristics...targeting users using the comparison... and transmitting the first document object to the targeted users," as recited in claim 11. Again, Kleinburg merely teaches a user entering a keyword query and the system returning pages based on that query and additional pages with content-based links to the returned pages. There is no suggestion or disclosure in this or any other teaching of Kleinburg of the recited features. Accordingly, claim 17 is not rendered obvious by Mangat and Kleinburg.

**CONCLUSION**

In view of the above remarks, Applicants respectfully assert that the application is in condition for allowance. Prompt examination and allowance of claims 1-18 is respectfully requested. Applicants respectfully request that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'S. Wooden', written over a horizontal line.

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